

*David A. Hadden*

February 15, 2009

Dear Senate Natural Resource Committee:

I write you today regarding SJ21, "4 A JOINT RESOLUTION OF THE SENATE AND THE HOUSE OF REPRESENTATIVES OF THE STATE OF MONTANA RELATING TO THE U.S. FOREST SERVICE GALTON STUDY AREA."

I have have been a 'multiple user' of the "Galton Study Area" for many years and write to urge you to not pass this resolution out of committee.

The resolution contains many factual errors too numerous to correct. These factual errors underlie the presumed 'need' for this resolution. No such need exists.

Line 20 states: "WHEREAS, those studies have extended 19 years past the deadline when conclusions were to have been reached from those studies".

Congress has not acted to resolve the disposition of the Ten Lakes WSA, and therefore no deadline has been reached. The disposition of the Ten Lakes WSA falls to Congress.

Line 22 states: "WHEREAS, the wilderness study status has resulted in a lack of management, and the lack of management has created a de facto wilderness area without any wilderness designation having been made by Congress".

The Kootenai National Forest has managed the Ten Lakes areas for many years. No "lack of management" exists as claimed in this resolution. The area is managed as a Wilderness study area but not as a "de-facto wilderness" as claimed. Trails are maintained. Fires area controlled. Even snowmobiles are permitted to use the area under current management. The proposed new Galton Project promises to update the ongoing management of the area and to address inconsistencies in past management.

Line 25 states: "WHEREAS, the de facto wilderness status has resulted in damage to and destruction of a national resource by root rot, infestations of insects, and spread of Douglas-fir bark beetle".

Root rot and beetle killed trees are not the result of the area's management status. All of us recognize that forest insects have reached high levels in many areas because of drought and warmer winters. Much of the Ten Lakes WSA is above or beyond productive timber ground. Much of the productive timber ground within and immediately outside the Ten Lakes WSA has been previously harvested.

The next few lines of this Resolution make claims about

damage to private lands adjacent to the WSA. This may be the case. However, the Murphy Lake Ranger District has been proactive in addressing high priority areas of national forest lands within the "Wildland Urban Interface" to address the risk of fire in particular. It is the responsibility of the private land owner to protect their own property. The Forest Service has been doing its part.

Page 2, line 2 talks about preferring 'active management' over 'passive management'. The term 'passive management' has come to mean 'any management I don't like'. 'Active management' means 'management I like', depending on one's point of view, and not based on scientific management practices. These are not valid forestry concepts and do not necessarily conform to the science of forestry.

Page 2, Line 4 states: " WHEREAS, now another "study within a study" has been initiated by the U.S. Forest Service and the local ranger district in what it calls the Galton Study Area, which includes 42,905 acres of private land in the 170,285 acres in the overall "study" area".

This statement is incorrect on its face. The Galton project includes a much larger area than the Ten Lakes WSA. The intent of this project is to develop a "forest travel plan" for the planning area. Private land uses will not be affected by the finished plan; it is simply easier to draw a project boundary around the entire area including areas of private land next to and surrounded by national forest lands.

Lines 9 through 12 are correct: the Galton Project is 'Not about wilderness'. However, a portion of the Galton Project area remains a Wilderness Study area until Congress acts to change that designation.

The resolution section of this Resolution makes the incorrect assumption that national forest management is 'all about access', vehicular access we must assume. Access, by foot, motor vehicle, over snow machine, horse, etc... is currently permitted over the entire area in one form or another. Access has not been denied. Furthermore, access for recreation, is just one multiple use.

Current management practices for the area do allow for fire suppression. Providing additional roaded access would not necessarily improve the Forest Service's ability to respond to wildfire.

Page 2, line 29, talks about providing 'accommodations for overflow of visitors to adjacent Glacier National Park'. We are unclear what this means.

Page 3, Line 3, begins talking about providing road access for disable recreationists by providing 'at least one loop road in each drainage'. We believe this resolution would be impossible to implement because each drainage in the study area is not necessarily roaded, or does not currently provide connected road segments to other drainages. The cost to implement this provision would be prohibitive.

Page 3, Line 8, calls for Forest Service to coordinate with the Montana Legislature and local governments on any road changes based on a concept called 'coordinating authority'. We believe the Forest Service already provides local governments with extraordinary ability to express their concerns.

In conclusion, we again ask that the committee vote to not bring this resolution to the floor.

Thank you for considering my too-lengthy comments.

Best Regards,

Dave Hadden

545 Holt Drive, Bigfork, MT 59911 / 406-837-0783